

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

RENNELL REED-FARMER,

Plaintiff,

v.

EQUITYEXPERTS.ORG, LLC,

Defendant.

Case No.: 2:16-cv-14347-AC-DRG
Hon. Avern Cohn
Mag. Judge David R. Grand

**DEFENDANT EQUITYEXPERTS.ORG, LLC'S OFFER OF JUDGEMENT
DIRECTED TO PLAINTIFF**

Pursuant to Fed. R. Civ. P. 68, Defendant EQUITYEXPERTS.ORG, LLC

hereby serves an offer to allow judgment to be taken against it and in favor of Plaintiff, Renell Reed Farmer as follows:

1. EQUITYEXPERTS.ORG, LLC makes this Offer of Judgment as to all claims brought against EQUITYEXPERTS.ORG, LLC and any of its agents or assignees as set forth in Plaintiff's Complaint and any amendments thereto.
2. This Offer is being made to Plaintiff only.
3. Defendant EQUITYEXPERTS.ORG, LLC, hereby offers to stipulate to entry of judgment in the amount of Two Thousand Dollars and Zero Cents

(\$2,000.00) to satisfy Plaintiff's entire claim against Defendant EQUITYEXPERTS.ORG, LLC, as to all claims brought against EQUITYEXPERTS.ORG, LLC and any of its agents or assignees as set forth in Plaintiff's Complaint and any amendments thereto, including all claims for interest, costs, and attorney fees.

4. This Offer is made solely for the purposes specified in Fed. R. Civ. P. 68 and is not an admission of liability by EQUITYEXPERTS.ORG, LLC and any of its agents or assignees.

5. In accordance with Rule 68, if this Offer is not accepted by Plaintiff within fourteen (14) days after service of this Offer, the Offer shall be deemed withdrawn and evidence of this Offer will be inadmissible except in any proceeding to recover costs. If this Offer is not accepted by Plaintiff and the judgment finally obtained by Plaintiff is not more favorable than this Offer, Plaintiff must pay their costs and attorney's fees incurred after service of this Offer, as well as EQUITYEXPERTS.ORG, LLC's costs as allowed by the rules of this District.

WHEREFORE, this offer of judgement is made for the purposes specified in F.R.C.P. 68 and shall not be construed as either an admission that Defendant EQUITYEXPERTS.ORG, LLC and any of its agents or assignees, is liable in this action, nor shall it be construed to operate to extinguish or diminish the Debt underlying this action, or as an admission that Plaintiff has suffered any damages. This offer of judgement is intended to resolve all of Plaintiff's claims in this action against Defendant EQUITYEXPERTS.ORG, LLC and any of its agents or assignees, including but not limited to all claims for damages, costs, attorney fees, litigation expenses, and interest.

Accepted: _____

Date: _____

Dated: October 31, 2019

Respectfully submitted,
/s/ Katrina M. DeMarte
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties to the above cause, via electronic mail the same to them at their respective addresses as disclosed by the pleadings herein on October 31, 2019.

/s/ Katrina M. DeMarte, Esq.